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Attorney for Defendant Berg Liquor Systems, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AUTOBAR SYSTEMS OF N.J.,
d/b/a TOTAL LIQUOR CONTROLS
Plaintiffs,
-against-
BERG COMPANY, LLC, and BERG
LIQUOR SYSTEMS, LLC,
Defendants.

Civil Action No.
3:23-CV-03790-MAS-JBD

**NOTICE OF MOTION ON
CONSENT FOR ADMISSION
OF APPLICANTS
PRO HAC VICE**

Motion Day:
October 9, 2023

TO: Michael J. Canning
GIORDANO, HALLERAN & CIESLA, P.C.
125 Half Mile Road
Suite 300
Red Bank, NJ 07701
Attorney for Plaintiffs

PLEASE TAKE NOTICE that on October 9, 2023, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants Berg Liquor Systems, LLC shall move this Court, pursuant to Local Civil Rule 101.1(c), for an Order permitting the appearance *pro hac vice* of H. William Burdett, Jr., and Cianna G. Halloran in this matter.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendants shall rely upon the declarations of H. William Burdett, Jr., Cianna G. Halloran, and Timothy M. Haggerty submitted herewith. Local Civil Rule 101.1(c)(1) provides that an attorney who is a member in good standing of the bar of any court of the United States or of the highest court of any state may be admitted *pro hac vice* in the discretion of the Court. The qualifications of H. William Burdett, Jr. and Cianna G. Halloran are adequately described in the accompanying declarations, and it is submitted that no brief is necessary. Plaintiffs' counsel has consented to this motion.

Dated: Newark, New Jersey
September 20, 2023

s/ Timothy M. Haggerty
Timothy M. Haggerty
(NJ Bar #30462005)
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